

Town of East Hampton
Water Pollution Control Authority
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East Hampton, Connecticut 06424-0218
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January 21, 2010

Mr. Paul Stacey, Hearing Officer
State of Connecticut - DEP
Bureau of Water Protection and Land Reuse
Planning & Standards Division
79 Elm Street
Hartford, Ct 06106

Re: Public Testimony Stream Flow Regulations

My, name is Vincent F. Susco, Jr. I have been the Public Utilities Administrator for the Town of East Hampton, CT for over ten years and have over 35 years of experience in the water industry.

In the Town of East Hampton there are over 50 Community Water Systems (CWS), 14 of these CWS's are owned by the Town. All of these CWS's are supplied by rock wells. The total production does not exceed 50,000 gallons per day for any of these systems.

At first glance, the proposed streamflow regulations should have no affect on the continued operation of these CWS's, however this is not the case. All of these CWS are decentralized and require a myriad of treatment systems in order to operate. These existing systems are inefficient to operate and require a centralized water supply in order to assure long-term reliability and compliance with state and federal drinking water quality requirements.

Pursuant to the State of Connecticut Department of Public Health Drinking Water Division (DWD), acting under the authority of Section 25-32d of the Connecticut General Statutes and Sections 25-32d-1a through 23-32d-6 of the Regulations of Connecticut State Agencies, the Town of East Hampton submitted an "Initial Water Supply" (IWSP) on November 19, 2004. This plan approved by the DWD on August 30, 2006 identified a 0.743MGD wellfield and a conceptual design of a new water system that will meet the Town's long term goal of reliability and compliance.

This IWSP further identified that this supply will be the only wellfield to be developed within the boarders of East Hampton and that additional increments of supply required to meet the Town's demand will have to be imported. This importation of water has been coined as "regionalization" and it is this state initiative that these proposed regulations fail to address.

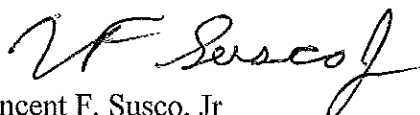
Regionalization provides for a sharing of natural resources from one entity to another..... those that *have*..... sharing with those that *have not*.

The proposed regulations require forced releases of water and limitations on withdrawals which will result in a reduced amount of water available for regionalization. Preliminary estimates by the Connecticut Water Works Association (CWWA) indicate that these regulations could eliminate more than 15% of the available public water supply. Municipalities will be required to meet the demand of their existing customers and will forgo plans to export supplemental supply. This will severely impact large and small water suppliers and it is imperative these impacts be thoroughly understood before the regulations are implemented.

It is clear these regulations fail to address key state initiatives such as "regionalization" and our counterintuitive to the more recent "smart growth" initiatives. As proposed these regulations fail to meet their intended purpose of seeking a balance between ecological issues and the vital water needs of the public.

By your own admission, only 0.4% of the rivers and streams in the state are demonstrating flow impairment issues and the regulations should address the actual problem. To do this we strongly recommend the DEP return to the table and develop with the stakeholders a remedy to the *real* problem.

Very truly yours,

A handwritten signature in black ink, appearing to read "VF Susco, Jr.", written in a cursive style.

Vincent F. Susco, Jr
Public Utilities Administrator

CC: Honorable M. Jodi Rell